

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

1. Referring to SDG&E Prepared Supplemental Direct Testimony of Andrew Scates on Behalf of SDG&E (Prepared Supplemental Testimony), filed on May 1, 2013, on page 3, lines 14-19, please provide on an hourly basis for each day of the record period from January 1, 2012 until December 31, 2012 an Excel spreadsheet with the following format:

Date (a)	Hour (b)	SDG&E's bundled load requirements (c)	SDG&E's aggregate energy schedules (d)	Purchases for serving bundled load (e)	Net Open Position (f) = d - e	"In the money" financial products (g) ***	SDG&E's awarded supply position (h)	Net Short (i), if c > g+h	Net Long (j), if g+h > c
1/1/12	HE01								
1/1/12	HE02								
1/1/12	HE03								

Notes:

*** Please explain whether or not the "in the money" financial products are considered by SDG&E when calculating net short and net long positions. Why or why not? If they are considered, how are these "in the money" financial products accounted for in SDG&E's Prepared Supplemental Testimony? Please separate these financial products and place them in Column G above. If "in the money" financial products are not considered, please input zero ("0") in Column G above.

- 1.1 For comparison purposes, please provide on an hourly basis for each day of the record period between January 1, 2011 and December 31, 2011 an Excel spreadsheet with the same format as describe in question #1.

SDG&E Response 1:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

SDG&E included the requested table in the attachment named DRA-SDG&E-ERRA-SONGS-1_Q1 Confidential.xlsx. Below are notes on the information included in the table to provide more clarity.

RESPONSE REMOVED DUE TO CONFIDENTIALITY

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

SDG&E Response to Question 1.1

SDG&E has not performed the study requested in Question 1.1, and to perform the study requested would be unduly burdensome. Commission practice does not require parties to prepare analyses or studies in response to data requests, but rather requires parties to furnish available, responsive information.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

2. Referring to SDG&E’s Prepared Supplemental Testimony on page 3, lines 23-27 please provide on an hourly basis for each day of the record period from January 1, 2012 until December 31, 2012 an Excel spreadsheet with the following format:

Date (a)	Hour (b)	CAISO SP-15 Trading Hub day-ahead, hourly price (c)	CAISO’s hourly IFM prices at SCE’s DLAP (d) *** (see note below)	Difference in Price in dollars (e) between (c) and (d)	Difference in Price in % (f) between (c) and (d)
1/1/12	HE01				
1/1/12	HE02				

Notes:

*** Please explain whether or not CAISO’s hourly IFM prices at SCE’s DLAP or SDG&E’s DLAP are more appropriate for purposes of estimating SDG&E’s costs of replacement of energy for 2013. If, SDG&E’s DLAP prices are more appropriate, please input those prices into column (d) in the spreadsheet above, instead of CAISO’s hourly IFM prices at SCE’s DLAP.

- 2.1 Please explain the reasons for the difference in price in terms of a % between (c) and (d) that is larger than 5% in general terms. Please provide a more detailed explanation for the difference that is larger than 10%.
- 2.2 For comparison purposes, please provide on an hourly basis for each day of the record period between January 1, 2011 and December 31, 2011 on an Excel spreadsheet with the same format as described in question #2.

SDG&E Response 2:

The requested information is provided in the attachment named ***DRA-SDG&E-ERRA-SONGS-DR-1_Q2.xlsx***.

SP15 is the most appropriate pricing point for estimating SDG&E’s cost of replacement energy. However, in response to the note above, which we are advised by Yakov Lasko was intended to pertain solely to 2012 and not 2013, SCE’s DLAP is more appropriate than SDG&E’s DLAP for estimating SDG&E’s cost of replacement of energy for 2012. The value lost from the SONGS outage is the revenue SDG&E would have received at the SONGS PNODE, and SCE’s DLAP is more representative of that price. One reason SCE’s DLAP is more representative is that SONGS is attributed to Local Resource Adequacy in the LA Basin (in SCE’s DLAP), and is not considered a Local Resource for SDG&E.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

SDG&E Response 2-(Continued):

Another reason SCE's DLAP is more representative is that the prices in SCE's DLAP are more closely correlated to the prices at the SONGS PNODE relative to the prices at SDG&E's DLAP.

- 2.1 The prices for all pricing points in the CAISO IFM, including SCE's DLAP and SP15, are determined by the CAISO's full network model. SDG&E does not know all of the inputs to the model or the specific reasons for the prices that the model produces.
- 2.2 The requested information is provided in the attachment named ***DRA-SDG&E-ERRA-SONGS-DR-1_Q2.xlsx***.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

3. Please provide SDG&E's final assessed net open energy position prior to the commencement of its day-ahead spot market trading activity for each hour of each day for the record period from January 1, 2012 until December 31, 2012 in a separate Excel spreadsheet.

SDG&E Response 3:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

The requested information is provided in the attachment named *DRA-SDG&E-ERRA-SONGS_DR-1_Q1 Confidential.xlsx*.

ATTACHMENT REMOVED DUE TO CONFIDENTIALITY

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

4. Referring to SDG&E's Prepared Supplemental Testimony on page 4, lines 13-17, please provide the annual average forced outage rate experienced by SONGS Units 2 and 3 for the five-year period (2007-2011), 3-year period (2009-2011), 2-year period (2010-2011), and one-year period (2011). For the same durations, please provide the annual average forced outage rate experienced by Unit 2 (separate from Unit 3) and for Unit 3 (separate from Unit 2). Please provide the relevant documents, files, and records in support of these numbers.

SDG&E Response 4:

As a non-operating owner, SDG&E relies on SCE as the Operating Agent to provide this information. Please contact SCE in its capacity as the Operating Agent for a response to this question.

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

5. Please provide the dates when the new steam generators were installed. What was the annualized forced outage rate experienced by SONGS Units 2 and 3, in aggregate, prior to 2012 since the new generators have been installed? What was the annualized forced outage rate experience by SONGS Unit 2 (separate from Unit 3) and for Unit 3 (separate from Unit 2) prior to 2012 since the new generators have been installed? Please provide the relevant documents, files, and records in support of these numbers.
- 5.1 Since the installation of new steam generators in Unit 2, what is the total number of hours the unit has been in a forced outage? Since the installation of new steam generators in Unit 2, how many hours have passed prior to the full shutdown of Unit 2 in hour-ending 21 on January 9, 2012?
- 5.2 Since the installation of new steam generators in Unit 3, what is the total number of hours the unit has been in a forced outage? Since the installation of new steam generators in Unit 3, how many hours have passed prior to the full shutdown of Unit 3 in hour-ending 17 on January 31, 2012?

SDG&E Response 5:

As a non-operating owner, SDG&E relies on SCE to provide this kind of information. Please contact SCE, as the Operating Agent, for responses to these questions.

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

6. With respect to the nuclear fuel as described in SDG&E's Prepared Supplemental Testimony on page 4, lines 18-24, please provide or answer the following, if applicable to SDG&E:
- 6.1 What modifications, if any, are necessary before the nuclear fuel customized for SONGS can be resold? What are the costs of these modifications in nominal dollar terms for the SDG&E's SONGS nuclear fuel inventory that has not been spoiled or ruined? Who would be responsible for the costs of these modifications?
 - 6.2 Has SDG&E contacted any party with a proposal to sell the nuclear fuel that was designated for SONGS units since the outage began? Has SDG&E been contacted by a third party with a proposal to buy the nuclear fuel designated for SONGS units since the outage began?
 - 6.3 Under the assumption that SONGS Unit 2 and 3 will be permanently shut down, what would be the fair market value of nuclear fuel inventory in nominal dollars and \$/MWh? Please provide any documents that were consulted in developing your opinion of the fair market value of the nuclear fuel referenced in the cited testimony. Do not include any shipping & handling, taxes, modification costs or other charges in this opinion.
 - 6.4 Please include all the line-item costs that would be associated with reselling the nuclear fuel to a third party, such as transportation costs, reprocessing fees, taxes, etc.
 - 6.5 For all of the nuclear fuel in SDG&E's inventory for SONGS Units 2 and 3, please provide all of the invoices for each transaction. In addition to providing the invoices, please include an Excel spreadsheet with the following columns: (1) date of purchase, (2) amount purchased in units, (3) total price paid, (4) price per unit, (5) total shipping and handling costs, (6) shipping and handling costs per unit, (7) other total costs such as insurance, etc., (8) other total costs per unit purchased. Please indicate the components of other total costs.
 - 6.6 Please indicate SDG&E's inventory accounting methodology with respect to nuclear fuel. What accounting inventory method has SDG&E used in computing nuclear fuel costs on page 4, lines 22-24? What accounting inventory methodology does SDG&E use when reporting inventories to SEC on its annual Balance Sheet?

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Question 6 (Continued)

- 6.7 Please provide the nuclear fuel costs for the following inventory accounting methodologies for SONGS Unit 2 and 3: First In, First Out (FIFO), Last In, Last Out (LIFO), weighted average method, and specific identification method. Please show the calculations in a separate excel sheet in four separate tabs for each methodology.
- 6.8 Please explain why the nuclear fuel costs for Unit 3 are \$6.457/MWh, while they are \$7.723/MWh for Unit 2 for the period from January 1, 2012 through December 31, 2012. Please provide supporting documents, workpapers, invoices, and files in support of these numbers.
- 6.9 Please provide any workpapers on SDG&E's decision to refuel Unit 2 after the Unit 3 forced outage began on January 31, 2012. Please provide estimated cost of SDG&E's portion of the nuclear fuel that was used to refuel Unit 2 after Unit 3 forced outage began in nominal dollar terms, cost per unit, and units of nuclear fuel used.
- 6.10 Under the assumption that SONGS will not restart, please provide any workpapers on the estimated cost of the SDG&E's portion of the nuclear fuel that was ruined due to the refueling of Unit 2 after January 9, 2012 and Unit 3 after January 31, 2012 in nominal dollar terms, cost per unit, and units of nuclear fuel used. If the nuclear fuel has been used in refueling, can it be salvaged and resold? What is the salvage value of the nuclear fuel that has been used in refueling in nominal terms and as a percentage of the original value prior to refueling?
- 6.11 When did SDG&E stop accepting and/or requesting fuel deliveries after the outages at SONGS for Unit 2 and Unit 3 respectively? What was the rationale for such a decision? What are the contract implications, if any, with the seller of the nuclear fuel? Please provide all of the relevant workpapers.

SDG&E Response 6:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

Please see SCE's responses to Questions 6.1, 6.2, 6.3, 6.4, 6.5, 6.9, 6.10 and 6.11 since SCE is the SONGS Operating Agent.

SDG&E Response to Question 6.6:

SCE, as the operating owner of SONGS and Operating Agent is able to fully explain nuclear fuel issues related to SONGS. SCE uses a batch method to calculate nuclear fuel batches. SDG&E

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Response to Question 6.6 (Continued):

uses the batch costs paid for its 20% ownership share divided by the forecast generation for that fuel cycle. For Balance Sheet accounting, SDG&E uses accounts denoting the various phases of

nuclear fuel processing (raw uranium, conversion, enrichment, fabrication and nuclear fuel in reactor less accumulated amortization).

SDG&E Response to Question 6.7:

SCE as the operating owner of SONGS and Operating Agent is able to fully explain nuclear fuel issues related to SONGS. SCE uses a batch method (specific identification) to calculate nuclear fuel batches. That methodology generally uses the FIFO method for raw uranium and the batch method for the nuclear fuel processing steps to convert, enrich and fabricate the fuel. SDG&E does not use the LIFO or weighted average method and believes the request to recalculate batch costs using the LIFO or weighted average is onerous and burdensome. Generally LIFO or weighted average method would result in higher batch costs as older now expired, low cost uranium contracts result in lower cost batches. The old contracts have been replaced by new contracts at higher indexed market prices that result in more recent batches of fuel costing more, resulting in a higher cost per MWh of output.

SDG&E Response to Question 6.8:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

ATTACHMENT AND VERBIAGE REMOVED DUE TO CONFIDENTIALITY

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OII.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

7. Regarding Table 1: SONGS OII – 2012 OMA Entries for Replacement Energy Costs and the equation $Q*(P-F) + O = \text{Replacement Energy Cost}$ on page 6 of SDG&E’s Prepared Supplemental Testimony, please break down each month on an hourly basis for each day of the record period from January 1, 2012 until December 31, 2012 and provide an Excel table with the following columns for Unit 2 in the first tab, for Unit 3 in the second tab, and SONGS total (as the sum of Unit 2 and Unit 3), in the third tab. Please note that the sum for monthly totals for each month broken down by day and by hour in the first two tabs should add to the monthly SONGS total in the third tab which would be equal to the monthly replacement energy costs in Table 1 on page 6 (ex. \$2,852,770 in replacement energy costs and 123,942 MWh for February).

Date (A)	Hour (B)	Hourly Net Short Position (MWh) (C)	(C) adjusted by 2.8% for historical outage rate (MWh) (D)	CAISO SP-15 Trading Hub DA price (\$/MWh) (E)	The avoided cost of nuclear fuel (\$/MWh) (F)	CAISO Allocated Costs and QF Disp. Costs (G)	Hourly Replacement Energy Cost (\$) (H) = (D)*[(E)-(F)] + (G)	Hourly Replacement Energy (MWh) (I)
1/1/12	HE01							
1/1/12	HE02							

Please also send all the relevant Excel files and supporting documents that were used in the computation of aggregate monthly numbers for replacement energy costs and replacement energy in MWh in Table XVII-1.

- 7.1 With respect to CAISO Allocated costs (CRR, SCP, GMC, Imbalance Charges, PIRP) and QF Dispatchable Costs, as described in the SDG&E’s Prepared Supplemental Testimony on pages 5-6, please break down each cost on an hourly basis for each day of the record period from January 1, 2012 until December 31, 2012 and provide an Excel table with the following columns for Unit 2 in the first tab, for Unit 3 in the second tab, and SONGS total (as the sum of Unit 2 and Unit 3), in the third tab. Please note that the sum of hourly CAISO Allocated Costs should be equal to column G in table under question #7.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OII.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Question 7 (Continued)

Date (A)	Hour (B)	CRR (C)	SCP (D)	Imbalance Charges (E)	Grid Management Charges (F)	PIRP (G)	QF Dispatchable Costs (H)	Sum of Columns C to H (I)

7.2 Please specify if the imbalance charges, as mentioned in SDG&E’s Prepared Supplemental Testimony on page 5, lines 19-21 are for Unit 2, Unit 3 or both. Please break down the total imbalance charges by Unit 2 and Unit 3.

SDG&E Response 7:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

The requested information is provided in the confidential attachment named DRA-SDG&E-ERRA-SONGS_DR-1_Q7.xlsx. Column (I) in the attachment has been removed as it represents the same value calculated in column (C). The Net Hourly Short Position in Column (C) represents the Hourly Replacement Energy as it relates to SONGS.

7.1 **ATTACHMENT AND RESPONSE REMOVED DUE TO CONFIDENTIALITY**

7.2. **ATTACHMENT AND RESPONSE REMOVED DUE TO CONFIDENTIALITY**

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

8. What are SONGS Unit 2 and Unit 3 net qualifying capacity? What is SDG&E's ownership share of SONGS Unit 2 and Unit 3 in percentage terms and MW quantities? What is total MW number for Unit 2 and Unit 3 did SDG&E use when calculating replacement energy costs in Table 1 on page 6?

SDG&E Response 8:

SONGS Unit 2 and Unit 3 net qualifying capacities are 1122MW and 1124MW respectively. SDG&E's ownership share of SONGS Unit 2 and Unit 3 are 20% for each unit and the MW quantities are 224.4MW and 224.8MW respectively. The total volume used when calculating replacement energy costs in Table 1 are 214MW for Unit 2 and 216MW for Unit 3. The difference between SDG&E's share of the net qualifying capacity and the volumes used in Table 1 are due to netting out Auxiliary Load.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OII.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

9. Regarding Table 2: SONGS OII – 2012 OMA Entries for Foregone Energy Sales Revenue on page 8 and the equation $Q * (P - F) + O = \text{Foregone Energy Revenue}$ on page 7, please break down each cost on an hourly basis for each day of the record period from January 1, 2012 until December 31, 2012 and provide an Excel table with the following columns for Unit 2 in the first tab, for Unit 3 in the second tab, and SONGS total (as the sum of Unit 2 and Unit 3), in the third tab. Please note that the sum for monthly totals for each month broken down by day and by hour in the first two tabs should add to the monthly SONGS total in the third tab, which should correspond to the monthly reporting of forgone excess energy sales revenue in Table 2 on page 8 (ex. \$598,144 in foregone energy sales costs and 29,179 in foregone energy sales in MWh for February).

Date (A)	Hour (B)	Hourly Net Long Position (MWh) (C)	(C) adjusted by 2.8% for historical outage rate (MWh) (D)	CAISO SP-15 Trading Hub DA price (\$/MWh) (E)	The avoided cost of nuclear fuel (\$/MWh) (F)	Lost revenue from RA sales (G)	Hourly Foregone Energy Revenue (\$) (H) = (D)*[(E)-(F)-(G)]	Hourly Foregone Energy Sales (MWh) (I)

Please also send all the relevant Excel files and supporting documents that were used in the computation of aggregate monthly numbers for forgone energy sales costs and foregone energy sales in MWh in Table 2.

SDG&E Response 9:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

RESPONSE AND ATTACHMENT REMOVED DUE TO CONFIDENTIALITY

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

10. Regarding Table 3: SONGS 2 & 3 – Summary of Capacity-Related Costs for OMA Reporting on page 9, please break down each cost on an hourly basis for each day of the record period from January 1, 2012 until December 31, 2012 and provide an Excel table with the following columns for Unit 2 in the first tab, for Unit 3 in the second tab, and SONGS total (as the sum of Unit 2 and Unit 3), in the third tab. Please note that the sum for monthly totals for each month broken down by day and by hour in the three tabs should correspond to the monthly column totals in Table 3 on page 9 (ex. Unit 2 = \$102,638; Unit 3 = \$102,638; Total Capacity Cost = \$205,275).

Date (A)	Hour (B)	CAISO CPM Charges (C)	Replacement RA Capacity (D)	Other Capacity-Related Costs (E)***	Total Hourly Capacity Cost (F) = C+D+E

***Note:

Please include any other capacity-related costs in column E and list those costs. If there were none, please put zero (0) in Column E.

- 10.1 Please account and explain for the difference between the aggregate monthly totals for February 2012 for Unit 3 (\$6,265) and Unit 2 (\$0).
- 10.2 What was the purpose of procuring replacement RA capacity? Was replacement RA capacity used to reduce Standard Capacity Product penalty charges? By how much were the SCP penalty charges reduced through procurement of replacement RA capacity? What other charges was SDG&E able to reduce through procurement of replacement RA capacity and by how much were those charges reduced?
- 10.3 Please provide an Excel table (broken down by days and hours if feasible) as well as any workpapers in support of the table and its data that shows how and to what extent the SCP penalty and other capacity charges were reduced by the costs of procuring replacement RA capacity.

SDG&E Response 10:

Capacity costs are monthly costs, not hourly. SDG&E has modified the table to reflect such monthly costs.

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

SDG&E Response 10-(Continued):

**ATTACHMENT AND RESPONSES FOR Q10.1-3 HAVE BEEN REMOVED DUE TO
CONFIDENTIALITY**

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

11. Does SONGS have any electrical demand requirements that are served by station(s) generation when one or both units are operating? Has SDG&E incurred any on-site auxiliary load costs once the dual unit outage event began? If so, what were those costs for the record period from January 1, 2012 through December 31, 2012 and how and where are these costs accounted for in SDG&E's Supplemental Direct Testimony? What is SDG&E's ownership share of these costs as a percentage of the total on-site auxiliary load costs, if any? Please provide supporting documents, invoices, workpapers, etc., if applicable.

SDG&E Response 11:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

ATTACHMENT AND RESPONSE REMOVED DUE TO CONFIDENTIALITY

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

12. Does SDG&E have an outage insurance policy? If so, please provide the following:
- 12.1 A copy of the policy, along with any documents that may modify that policy;
 - 12.2 A copy of all recorded communications, including but not limited to emails, letters, reports, claims, proofs of loss, or the like, that relate to any claims made on that policy in 2012. Please provide a privilege log if such a claim is being asserted;
 - 12.3 A description of how power replacement costs are calculated under the outage policy;
 - 12.4 A description of how power replacement costs calculated under the outage policy differs from how SDG&E calculates power replacement costs.

SDG&E Response 12:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

12. Yes, SDG&E, with the other owners of SONGS, has an outage insurance policy with Nuclear Electric Insurance Limited (NEIL).
- 12.1 Please see SCE's response to DRA-SCE-ERRA-DR1 question 17.1.
- 12.2 Please see SCE's response to DRA-SCE-ERRA-DR1 question 17.2 for cover letters and proof of loss documents submitted to NEIL, and any NEIL correspondence relevant to this question. Please see the following confidential attachments for SDG&E specific adjustment claim forms.

ATTACHMENTS REMOVED DUE TO CONFIDENTIALITY

- 12.3. Please see the October 1 Cover letter provided in SCE's response to DRA-SCE-ERRA-DR1 question 17.2 for the description of how power replacement costs are calculated under the NEIL insurance policy.
- 12.4 **RESPONSE REMOVED DUE TO CONFIDENTIALITY**

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

SDG&E Response 12:-Continued

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

1. RESPONSE REMOVED DUE TO CONFIDENTIALITY
2. RESPONSE REMOVED DUE TO CONFIDENTIALITY
3. RESPONSE REMOVED DUE TO CONFIDENTIALITY

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

13. What reactive power and grid voltage support costs, if any, has SDG&E incurred as a result of the SONGS outage? How and where are these costs accounted for in SDG&E's Supplemental Direct Testimony? What has SDG&E done, is currently doing, and is planning to do to address reactive power and grid voltage support needs as a result of the SONGS outage? What was the cost of this in 2012 and what will the costs be in 2013 and 2014?

SDG&E Response 13:

SDG&E objects to the question asking for costs for transmission plant that will provide reactive power and grid voltage support during 2013 and 2014 as a result of the SONGS outage on grounds that it is out of scope and irrelevant to issues being decided in Phase 1 of the OIL.

SDG&E has incurred no costs for transmission plant providing reactive power and grid voltage support during 2012.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OII.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

14. What RA contracts, both system and local, has SDG&E entered into to address the SONGS outage in 2012, 2013, and 2014? Please provide the contracts, contracts' costs and relevant workpapers as an attachment for each year respectively.

SDG&E Response 14:

Please note that this response includes confidential/privileged material; review and access restricted; subject to PUC Sections 454.5(g), 583, GO66-C, D.06-06-066 and D.08-04-023.

SDG&E objects to the question with respect to contracts entered into in 2013 to address the SONGS outage in 2013 and 2014 as out of scope and not relevant to Phase 1 of the OII.

ATTACHMENT AND RESPONSE REMOVED DUE TO CONFIDENTIALITY

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

15. With respect to SDG&E's Supplemental Direct Testimony on pages 4-5 regarding CRRs, please explain and provide supporting documents, workpapers, emails, files and other pertinent information when appropriate for the following questions:
- 15.1 What was SDG&E's strategy in 2011 in general terms, prior to SONGS outage, when it came to CAISO's allocations and auctions of CRRs? Does SDG&E request CRRs to be allocated to SONGS by CAISO or is SDG&E assigned CRRs at SONGS by CAISO? If both, please provide the breakdowns for requested CRRs vs. allocated CRRs as a percentage of the total CRRs that belonged to SDG&E at SONGS at the end of 2011.
- 15.2 Prior to January 8, 2012, of all the CRRs that were held by SDG&E at SONGS, in percentage terms, what percent of CRRs was acquired by SDG&E voluntarily (such as requesting allocation from CAISO or acquiring CRRs through an annual or monthly auction) and what percent was acquired by SDG&E involuntarily (assigned without request)?
- 15.3 How many allocations and auctions of CRRs are there per year? Are they done on an annual, quarterly, or monthly basis?
- 15.4 As the result of the SONGS outage, has SDG&E's SONGS CRRs incurred any negative revenue obligations? If so, please give the total incurred negative revenue obligations by each unit starting from the date and hour the forced outage began until the end of the record period. In addition, please break down those negative revenue obligations by month for each unit.
- 15.4.1 To what extent has SDG&E been able to offload CRRs that were incurring negative revenue obligations throughout 2012? Was it done on a monthly, quarterly, or annual basis? Please provide the amount of negative revenue obligations that was avoided by offloading CRRs at SONGS for 2012 record period.
- 15.4.2 Please net the negative CRR revenue obligations that were incurred as a result of SONGS outage (as answered in question 15.4) with the amount of negative revenue obligations that were avoided (as answered in question 15.4.1). Please break down the netted amount by SONGS unit and by month for the record period.
- 15.5 What was SDG&E's strategy in 2012 in general terms, after SONGS outage, when it came to CAISO's allocations and auctions of CRRs? If that strategy changed during the course of 2012, describe that change and provide any documents, emails, files and work papers that indicates the change(s) and the decision making process that lead up to that change.

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

Question 15 (Continued)

- 15.6 Did SDG&E request any CRRs to be allocated to it by CAISO for SONGS in 2012 during the outage? If so, what were the resulting negative revenue obligations from these new allocations as requested by SDG&E in 2012 for the record period?
- 15.7 Did SDG&E acquire any CRRs during the CRR auction process for SONGS in 2012 during the outage? If so, what were the resulting negative revenue obligations from these newly acquired CRRs as acquired by SDG&E in an auction in 2012 for the record period?
- 15.8 Was SDG&E allocated any CRRs by CAISO without asking for them for SONGS in 2012 during the outage? If so, what were the resulting negative revenue obligations from these new allocations for the record period?

SDG&E Response 15:

- 15.1 SDG&E objects on grounds that SDG&E's strategy in 2011 in general terms, prior to SONGS outage, when it came to CAISO's allocations and auctions of CRRs during 2011 is out of scope and irrelevant to issues being decided in Phase 1 of the OIL. Without waiving this objection, SDG&E responds as follows.

SDG&E's monthly strategy in 2011 was to augment previously awarded high value CRRs with quantities needed to hedge portfolio resource deliveries for each month. SDG&E nominated CRRs at SONGS via the annual and monthly nomination processes. Among the CRRs SDG&E nominated were CRRs at SP15 Trading Hub. When SDG&E nominates CRRs during the allocation process, CAISO will allocate the trading hub CRRs that SDG&E nominated, but CAISO will also allocate counter flow CRRs for locations in the trading hub which those CRRs were infeasible to allocate. SDG&E considers those counter flow CRRs at SONGS to be CAISO allocated and not SDG&E Nominated. The CAISO also allocated CRRs at SONGS due to load migration which causes a change in SDG&E's load ratio share and thus incrementally adds to the volume of CRRs at SONGS that SDG&E was allocated from its nominations.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

SDG&E Response 15.1 (Continued):

The table below depicts SDG&E’s CRRs that were nominated and received as well as the CRRs that were allocated to SDG&E without being nominated as a percentage of the total CRRs at SONGS Unit 2 and Unit 3 for 2011.

2011	SONGS Unit 2	SONGS Unit 3
SDG&E Nomination	84.93%	78.95%
CAISO Allocation	15.07%	21.05%

The requested information is provided in the attachment named ***DRA-SDG&E-ERRA-SONGS-DR-1_Q15.1.xlsx***

SDG&E Response 15.2:

15.2 The table below depicts SDG&E’s CRRs that were nominated and received as well as the CRRs that were allocated to SDG&E without being nominated as a percentage of the total CRRs at SONGS Unit 2 and Unit 3 on January 7, 2012.

2012 to 2017	SONGS Unit 2	SONGS Unit 3
SDG&E Nomination	88.26%	90.99%
CAISO Allocation	11.74%	9.01%

The requested information is provided in the attachment named ***DRA-SDG&E-ERRA-SONGS-DR-1_Q15.2.xlsx***

15.3. There are 28 allocations and 13 auctions of CRRs per year. These are broken into 2 allocation and 1 auction rounds per month for the next operating month and 4 allocation and 1 auction rounds per year for the following operating year. 1 of the 4 annual allocation rounds allows SDG&E to obtain CRRs for the following 10 years.

15.4 Yes, SDG&E’s SONGS CRRs did incur negative revenue obligations. The negative revenue obligations may or may not have been the result of SONGS outages. SDG&E purchased counter flow CRRs or offloaded these CRRs because the CRRs at SONGS no longer provided a hedge against congestion prices for SONGS energy output. Below are the tables by month for each unit starting from the date and hour of the forced outage until end of the record period.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Response to Question 15.4 Continued)

SONGS Unit 2

Month	CRR (Revenue) / Charge = Negative Revenue
3	\$2,755.74
4	(\$61,068.87)
5	(\$76,156.22)
6	(\$28,442.17)
7	\$120,579.12
8	(\$464,245.96)
9	(\$436,035.81)
10	(\$191,142.76)
11	\$57,081.82
12	\$357,679.63

SONGS Unit 3

Month	CRR (Revenue) / Charge = Negative Revenue
1	\$0.00
2	(\$125,496.51)
3	(\$3,659.84)
4	(\$61,068.87)
5	(\$76,156.22)
6	(\$28,442.17)
7	\$120,579.12
8	(\$464,245.96)
9	(\$436,035.81)
10	(\$191,142.76)
11	\$57,081.82
12	\$357,679.63

The requested information is provided in the attachment named ***DRA-SDG&E-ERRA-SONGS-DR-1_Q15.4.xlsx***

This attachment is to large to upload and available upon request on a CD.

15.4.1 SDG&E did not offload any SONGS CRRs in the secondary market. However, SDG&E did participate in the CAISO monthly CRR auctions to purchase counter flow CRRs at SONGS which acts as an offload of its SONGS CRRs position and to purchase CRRs at other locations to hedge against unexpected higher congestion due to the SONGS outages. Included below are only

DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013

the CRR revenue incurred from those auctions for CRRs at SONGS.

SONGS Unit 2

Month	CRR (Revenue) / Charge = Negative Revenue
8	\$251,098.30
9	\$308,638.13
10	\$52,361.20

SONGS Unit 3

Month	CRR (Revenue) / Charge = Negative Revenue
8	\$253,253.28
9	\$311,322.51
10	\$58,736.51
11	(\$38,584.19)
12	(\$121,119.90)

There were costs associated with offloading the CRRs at SONGS during the monthly CRR auctions. Below are the costs by unit by month. A negative cost means SDG&E received a payment to offload the CRRs.

SONGS Unit 2

Month	CRR Auction Costs (Negative) = Negative Cost
8	(\$27,178.70)
9	(\$42,831.59)
10	(\$1,971.97)

SONGS Unit 3

Month	CRR Auction Costs (Negative) = Negative Cost
8	(\$27,411.95)
9	(\$43,162.50)
10	(\$2,212.07)
11	(\$59,396.88)
12	(\$10,276.31)

The requested information is provided in the attachment named ***DRA-SDG&E-ERRA-SONGS-DR-1_Q15.4.xlsx***

15.4.2 Below are the net revenues for each SONGS unit by month including auction costs.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Response to Question 15.4.2 (Continued)

SONGS Unit 2

Month	CRR (Revenue) / Charge = Negative Revenue
3	\$2,755.74
4	(\$61,068.87)
5	(\$76,156.22)
6	(\$28,442.17)
7	\$120,579.12
8	(\$185,968.96)
9	(\$84,566.09)
10	(\$95,949.97)
11	\$57,081.82
12	\$357,679.63

SONGS Unit 3

Month	CRR (Revenue) / Charge = Negative Revenue
1	\$0.00
2	(\$125,496.51)
3	(\$3,659.84)
4	(\$61,068.87)
5	(\$76,156.22)
6	(\$28,442.17)
7	\$120,579.12
8	(\$183,580.72)
9	(\$97,301.34)
10	(\$104,994.30)
11	\$45,909.59
12	\$263,971.68

The requested information is provided in the attachment named *DRA-SDG&E-ERRA-SONGS-DR-1_Q15.4.xlsx*

- 15.5 At the beginning of the SONGS outages, before the long term nature of the outage was fully understood, SDG&E's strategy was to augment previously awarded high value CRRs, including SONGS, with quantities needed to hedge portfolio resource deliveries for each month. SDG&E continued the strategy until it was notified the return to service dates would be later than the month in which the allocation and auction processes were occurring for. At that point, SDG&E started to consider offloading CRRs by or purchasing counter flow CRRs at SONGS because the SONGS CRRs would not hedge against congestion for the

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OII.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Response to Question 15.5 (Continued)

SONGS energy output. SDG&E purchased counter flow CRRs up to the MW amount of CRRs SDG&E already held at SONGS.

- 15.6 Yes, SDG&E nominated CRRs at SONGS in the monthly CRR nomination processes during the early stages of the outage with the expectation both units would return to service for the following operating month. SDG&E incurred negative revenue from those new allocations. The table below shows the obligations by resource by month starting from the date and hour the forced outage began until the end of the record period.

Month	SONGS Unit 2 CRR (Revenue) / Charge = Negative Revenue	SONGS Unit 3 CRR (Revenue) / Charge = Negative Revenue
1		\$0.00
2		(\$1,792.08)
3	\$9,852.55	\$10,077.07
4	\$91,360.75	\$91,360.75

The requested information is provided in the attachment named *DRA-SDG&E-ERRA-SONGS-DR-1_Q15.6 and Q15.8.xlsx*

- 15.7 Yes, please see response to 15.4.1
- 15.8 Yes, when SDG&E nominates SP-15 trading hub CRRs during the allocation process CAISO will allocate the trading hub CRRs that SDG&E nominated but CAISO will also allocate counter flow CRRs for locations in the trading hub which those CRRs were infeasible to allocate. SDG&E considers those counter flow CRRs at SONGS to be CAISO allocated and not SDG&E nominated. The CAISO also allocated CRRs at SONGS due to load migration which causes a change in SDG&E's load ratio share and thus incrementally adds to the volume of CRRs at SONGS that SDG&E was allocated from its nominations. SDG&E incurred negative revenue from some of those allocations in some of the months from the date and hour of the outage to the end of the record period.

The table below shows the obligations by resource by month starting from the date and hour the forced outage began until the end of the record period.

**DRA DATA REQUEST
DRA-SDG&E-ERRA-SONGS DR-01
OIL.12-10-013
SDG&E RESPONSE
DATE RECEIVED: MAY 23, 2013
DATE RESPONDED: JUNE 7, 2013**

Response to Question 15.8 (Continued):

Month	SONGS Unit 2 CRR (Revenue) / Charge = Negative Revenue	SONGS Unit 3 CRR (Revenue) / Charge = Negative Revenue
1		\$0.00
2		\$41,523.74
3	(\$10,423.15)	(\$8,556.73)
4	(\$125,906.88)	(\$125,906.88)
5	(\$154,748.23)	(\$154,748.23)
6	(\$58,021.73)	(\$58,021.73)
7	(\$117,730.39)	(\$117,730.39)
8	\$46,035.21	\$46,035.21
9	\$83,494.91	\$83,494.91
10	\$28,951.34	\$28,951.34
11	(\$25,178.21)	(\$25,178.21)
12	(\$133,826.70)	(\$133,826.70)

The requested information is provided in the attachment named *DRA-SDG&E-ERRA-SONGS-DR-1_Q15.6 and Q15.8.xlsx*

This attachment is too large to upload and it is available upon request on a CD.