

ORA DATA REQUEST
ORA-SDG&E-DR-024-MRL
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 15, 2014
DATE RESPONDED: DECEMBER 30, 2014

Exhibit Reference: SDG&E-12-WP, Electric Generation - SONGS, page 16-18

Subject: SONGS Operations & Maintenance Expenses – Master Insurance Program

Please provide the following:

1. Complete copy of each and every actuarial and/or audit report on this General Liability and Workers' Compensation insurance plan from 2004 to the date of this request.

SDG&E Response 01:

To SDG&E's knowledge and belief, the information requested in Q1 is in SCE's possession. SDG&E does not have this information in its possession. SCE has declined to provide this information to SDG&E, stating that it contains personal information.

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2. Complete copies of each and every billing from MIP “claims” to SCE and from SCE to SDG&E from 2009 through 2014.

SDG&E Response 02:

To SDG&E’s knowledge and belief, the information responsive to the request in Q2 for “copies of each and every billing from MIP “claims to SCE” is in SCE’s possession. SDG&E does not have this information in its possession. SCE has declined to provide this information to SDG&E, stating that it contains personal information.

Please see attached files containing the invoices from SCE for SDG&E’s portion of MIP Claims (i.e., “Industrial accident and litigation costs”) billed to SDG&E from 2009 through October 2014. November and December 2014 have not yet been billed to SDG&E. Upon receipt of the November and December 2014 MIP invoices from SCE, SDG&E will provide copies to ORA.