

ORA DATA REQUEST
ORA-SDG&E-DR-038-TXB
SDG&E 2016 GRC – A.14-11-003
SDG&E RESPONSE
DATE RECEIVED: JANUARY 14, 2015
DATE RESPONDED: JANUARY 28, 2015

Exhibit Reference: SDG&E-25, Chapter V, pp. KJD-22 -- 29

Subject: Law Department and 2007 Wildfires

Please provide the following :

1. In SDG&E's May 2013, 10-Q filing, Note 10, SDG&E states that "[i]n October 2007, San Diego County experienced several catastrophic wildfires. Reports issued by the California Department of Forestry and Fire Protection (Cal Fire) concluded that two of these fires (the Witch and Rice fires) were SDG&E 'power line caused' and that a third fire (the Guejito fire) occurred when a wire securing a Cox Communications' (Cox) fiber optic cable came into contact with an SDG&E power line 'causing an arc and starting the fire.'" In Ex. SDG&E-25, p. KJD-22, SDG&E states "[a] three-year average methodology is used to forecast TY 2016 costs for the Law Department...." On page KJD-23, SDG&E says that "... for the entire Law Department, (excluding Claims) the TY 2016 forecast is derived using the three-year historical average of recorded costs from 2011-2013."
 - a. For the years 2011 – 2013 SDG&E used to forecast costs for the Senior Vice-President (SVP) and General Counsel (GC) Department, please identify by year and dollar amount any costs associated in any way with the 2007 catastrophic wildfires that were ignited by SDG&E power lines.
 - b. If it is SDG&E's position that there are no costs included in the historical average used to forecast SVP and GC Department costs that are associated in any way with the 2007 catastrophic wildfires ignited by SDG&E power lines, please provide any information that would allow ORA to verify that position.
 - c. For the years 2011 – 2013 SDG&E used to forecast costs for the Law Department Sections, please identify by year and dollar amount any costs associated in any way with the 2007 catastrophic wildfires that were ignited by SDG&E power lines.
 - d. If it is SDG&E's position that there are no costs included in the historical average SDG&E used to forecast Law Department Section costs that are associated in any way with the 2007 catastrophic wildfires ignited by SDG&E power lines, please provide any information that would allow ORA to verify that position.

SDG&E Response 01:

- a. There are no costs that are included in the SVP or GC departments relating to the wildfires.
- b. All wildfire costs are being captured in the Wildfire Expense Memo Account (WEMA) and will be addressed in a separate filing. See attached Preliminary Statement for the WEMA.
- c. There are no costs that are included in the Law Department Sections relating to the wildfires.

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Response to Question 1 (Continued)

- d. All wildfire costs are being captured in the Wildfire Expense Memo Account (WEMA) and will be addressed in a separate filing. See attached Preliminary Statement for the WEMA in Question 1(b).

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2. In Ex. SDG&E-25, at p. KJD-28, SDG&E states “... it is appropriate to use a five-year average to capture a reasonable cycle of Claims activity over the GRC period.” SDG&E also states that “[d]uring the last five years SDG&E has experienced increased litigation and claims exposure from new theories of liability and a concerted effort by skillful plaintiff advocates to expand the ‘duty owed’ and foreseeability as applied to public utilities.”
 - a. For the years 2009 – 2013 SDG&E used to forecast costs for Claims Payments and Recovery Costs, please identify by year and dollar amount any costs associated in any way with the 2007 catastrophic wildfires that were ignited by SDG&E power lines.
 - b. If it is SDG&E’s position that there are no costs included in the historical average SDG&E used to forecast Claims Payments and Recovery Costs that are associated in any way with the 2007 catastrophic wildfires ignited by SDG&E power lines, please provide any information that would allow ORA to verify that position.

SDG&E Response 02:

- a. There are no costs that are included in the Claims Payments and Recovery Costs Section relating to the wildfires.
- b. All wildfire costs are being captured in the Wildfire Expense Memo Account (WEMA) and will be addressed in a separate filing. See attached Preliminary Statement for the WEMA in Question 1(b).