



ORA

*Office of Ratepayer Advocates
California Public Utilities Commission*

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DATA REQUEST / A.17-01-020
SDG&E SB 350 Transportation Electrification Proposals

Data Request No: ORA-TE-SDG&E-04

Date of this Request: September 8, 2017

Date Responses Due: **On or before September 22, 2017**

To: Jennifer Wright
Regulatory Case Manager
Telephone:
E-mail: JWright@semprautilities.com

From: Rick Tse
Office of Ratepayer Advocates
505 Van Ness Avenue,
San Francisco, CA 94102
Email: rick.tse@cpuc.ca.gov
Phone: (415) 355-5581

Originated by: Matthew Yunge
Email: myu@cpuc.ca.gov
Phone: (415) 703-1667

INSTRUCTIONS

You are instructed to answer the following Data Requests in the above-captioned proceeding, with written, verified responses per Public Utilities Code §§ 309.5, 314, 314.5, 581 and 582, and Rules 1.1 and 10.1 of the California Public Utilities Commission's Rules of Practice and Procedure. Restate the text of each request prior to providing the response. For any Items, email the ORA contact(s) above with a copy to the ORA attorney.

These data requests should be considered continuing so that if any information provided changes, or new information becomes available that is responsive to a request, respondent is requested to supplement its response to ORA.

If the respondent objects to any of these data requests, please submit specific objections within five business days. If respondent asserts any privilege, please provide within ten business days a privilege log listing all documents the respondent claims are privileged and the following information for each document: the basis for the privilege claimed, a summary of the purpose and subject of the document withheld, the date of the document, the author(s), and all recipients of the document.

In responding to each request please restate the text of the request prior to providing the response, and provide the name of the person(s) answering the request, the title of such person(s), and the name and title of the person they work for. With respect to each document produced, identify the number of the data request and Item number that the document is responding to.

These data requests do not-supersede or excuse any pending oral data requests to the respondent unless that is expressly stated in the written data request.

Identify the person providing the answer to each data request and his/her contact information. Responses should be provided both in the original electronic format, if available, and in hard copy. (If available in Word format, send the Word document and do not send the information as a PDF file.) All electronic documents submitted in response to this data request should be in readable, downloadable, printable, and searchable formats, unless use of such formats is infeasible. Each page should be numbered. If any of your answers refer to or reflect calculations, provide a copy of the supporting electronic files that were used to derive such calculations, such as Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning. Documents produced in response to the data requests should be Bates-numbered, and indexed if voluminous. Responses to data requests that refer to or incorporate documents should identify the particular documents referenced by Bates-numbers or Bates-range.

If a request, definition, or an instruction, is unclear, notify ORA as soon as possible. In any event, answer the request to the fullest extent possible, specifying the reason for your inability to answer the remaining portion of the Data Request.

In answering these data requests, the respondent should adhere to the Commission's Rules of Practice and Procedure (Rules), with particular attention to Rule 1.1 of those Rules, which requires the respondent to "never mislead the Commission or its staff by an

artifice or false statement of law of fact.” The respondent should keep in mind that “Violations of Rule 1.1 can occur by a failure to correctly cite a proposition of law, a lack of candor, withholding information, providing incorrect information, or a failure to correct mistaken information.”^[1] ORA expects the respondent to respond to these data requests with the highest level of candor.

DEFINITIONS

Unless the request indicates otherwise, the following definitions are applicable in providing the requested information.

1. The terms “document,” “documents,” or “workpapers” include, without limitation, the following items, whether in electronic form, printed, recorded, or written or reproduced by hand: reports, studies, statistics, projections, forecasts, decisions, and orders, intra-office and interoffice communications, correspondence, memoranda, financial data, summaries or records of conversations or interviews, statements, returns, diaries, calendars, work papers, graphs, notebooks, notes, charts, computations, plans, drawings, sketches, computer printouts, summaries of records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, photographs, bulletins, records or representations or publications of any kind (including microfilm, videotape, and records however produced or reproduced), electronic or mechanical or electrical records of any kind (including, without limitation, tapes, tape cassettes, discs, emails, and records) other data compilations (including without limitation, input/output files, source codes, object codes, program documentation, computer programs, computer printouts, cards, tapes, discs and recordings used in automated data processing, together with the programming instructions and other material necessary to translate, understand, or use the same), and other documents or tangible things of whatever description which constitute or contain information within the scope of these data requests.
2. “Relating to” means concerning, addressing, referring, discussing, commenting upon, analyzing, mentioning or involving in any way.
3. “Identify”:
 - a. When used in reference to a person includes stating his or her full name, his or her most recent known business address and telephone number, and his or her present title or position;
 - b. When used in reference to documents includes stating the nature of the document (e.g., letter, memorandum), the date (if any), the title of the document, the identity of the author and/or the document, the location of the document, the identity of the

^[1] Administrative Law Judge’s Ruling Denying Southern California Edison Company’s Motion For Summary Adjudication Of Alleged Rule 1.1 Violations Related To Data Request Responses Dated December 10, 2010, I.09-01-018, January 10, 2012, p. 6.

person having possession, control or custody of the document, and the general subject matter of the document.

4. "CPUC" as used herein refers to the California Public Utilities Commission.
5. "ORA" as used herein refers to the Office of Ratepayer Advocates.
6. "SDG&E" as used herein refers to San Diego Gas and Electric Company and/or SDG&E or its affiliates.

Subject: SDG&E Transportation Electrification Application

Item 1: In the Rebuttal Testimony of SDG&E, Randy Schimka points out potential safety issues related to L1 charging. Is SDG&E aware of melted outlets or other hazards related to L1 charging occurring within its service territory? If so, what is the number of such incidents that have occurred in SDG&E's service territory? Please provide any documents documenting the occurrence of safety issues related to L1 charging.

Please send your response to the Originator, and a copy of your response to Project Coordinator and e-copies to the following ORA representatives:

matthew.yunge@cpuc.ca.gov

rick.tse@cpuc.ca.gov

Thomas.gariffo@cpuc.ca.gov

Tovah.trimming@cpuc.ca.gov

Please provide the above information as it becomes available but no later than the due date identified above. If you are unable to provide the information by this date, please notify the Originator **at least** 3 days before the data request is due and provide your best estimate of when the information can be provided. Please identify the person who provides the response and his/her phone number and email address.