



Shivani Sidhar  
Regulatory Case Manager  
San Diego Gas and Electric Company  
8330 Century Park Court  
San Diego, CA 92123-1530

August 24, 2016

**Sent Via Electronic Mail and FedEx**

A.15-09-010  
Wildfire Expense Memorandum Account

Nils Stannik  
Office of Ratepayer Advocates  
505 Van Ness Avenue, Room 4108  
San Francisco, CA 94102

**Re: SDG&E Response to ORA Data Request 11 – Wildfire Expense Memorandum Account**

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 11 (ORA-SDG&E-A.15-09-010-10), dated August 15, 2016. SDG&E's response includes general objections only.

If you have any questions or require additional information, please feel free to contact me by phone at (858) 637-7914 or e-mail: [SSidhar@semprautilities.com](mailto:SSidhar@semprautilities.com).

Sincerely,

**Signed**

Shivani Sidhar  
Regulatory Case Manager

Enclosures

cc: Chris Lyons – SDG&E  
Stacie Atkinson – SDG&E  
Ed Moldavsky - ORA

**ORA DATA REQUEST  
ORA-SDG&E DR-11, Q1-7  
SDG&E WEMA PROCEEDING - A.15-09-010  
SDG&E RESPONSE  
DATE RECEIVED: August 15, 2016  
DATE OF OBJECTIONS: August 24, 2016**

**I. GENERAL OBJECTIONS**

1. SDG&E objects generally to each request to the extent that it seeks information protected by the attorney-client privilege, the attorney work product doctrine, statutory mediation confidentiality (see Cal. Evid. Code §§ 1115-28) or any other applicable privilege or evidentiary doctrine. No information protected by such privileges will be knowingly disclosed.
2. SDG&E objects generally to each request that is overly broad and unduly burdensome. As part of this objection, SDG&E objects to discovery requests that seek “all documents” or “each and every document” and similarly worded requests on the grounds that such requests are unreasonably cumulative and duplicative, fail to identify with specificity the information or material sought, and create an unreasonable burden compared to the likelihood of such requests leading to the discovery of admissible evidence. Notwithstanding this objection, SDG&E will produce all relevant, non-privileged information not otherwise objected to that it is able to locate after reasonable inquiry.
3. SDG&E objects generally to each request to the extent that the request is vague, unintelligible, or fails to identify with sufficient particularity the information or documents requested and, thus, is not susceptible to response at this time.
4. SDG&E objects generally to each request that: (1) asks for a legal conclusion to be drawn or legal research to be conducted on the grounds that such requests are not designed to elicit facts and, thus, violate the principles underlying discovery; (2) requires SDG&E to do legal research or perform additional analyses to respond to the request; or (3) seeks access to counsel’s legal research, analyses or theories.
5. SDG&E objects generally to each request to the extent it seeks information or documents that are not reasonably calculated to lead to the discovery of admissible evidence.
6. SDG&E objects generally to each request to the extent that it is unreasonably duplicative or cumulative of other requests.
7. SDG&E objects generally to each request to the extent that it would require SDG&E to search its files for matters of public record such as filings, testimony, transcripts, decisions, orders, reports or other information, whether available in the public domain or through FERC or CPUC sources.
8. SDG&E objects generally to each request to the extent that it seeks information or documents that are not in the possession, custody or control of SDG&E.

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9. SDG&E objects generally to each request to the extent that the request would impose an undue burden on SDG&E by requiring it to perform studies, analyses or calculations or to create documents that do not currently exist.

10. SDG&E objects generally to each request that calls for information that contains trade secrets, is privileged or otherwise entitled to confidential protection by reference to statutory protection. SDG&E objects to providing such information absent an appropriate protective order. With respect to the Office of Ratepayer Advocates, however, SDG&E will produce such information subject to the requirements of Public Utilities Code Section 583 and General Order 66-C.

**II. EXPRESS RESERVATIONS**

1. No response, objection, limitation or lack thereof, set forth in these responses and objections shall be deemed an admission or representation by SDG&E as to the existence or nonexistence of the requested information or that any such information is relevant or admissible.

2. SDG&E reserves the right to modify or supplement its responses and objections to each request, and the provision of any information pursuant to any request is not a waiver of that right.

3. SDG&E reserves the right to rely, at any time, upon subsequently discovered information.

4. These responses are made solely for the purpose of this proceeding (A.15-09-010) and for no other purpose.

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**III. RESPONSES**

**Request #1:**

Regarding p.13, footnote 17, why didn't SDG&E request recovery of the WEMA costs under the Z-factor mechanism?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 1, 4 and 5. SDG&E further objects to this request on the grounds that it seeks discovery of information that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.

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**Request 2:**

Regarding Section V.B., does SDG&E request that the Commission find that inverse condemnation applies to the WEMA costs?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 1, 4 and 5. SDG&E further objects to this request on the grounds that it seeks discovery of information that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.

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**Request 3:**

Regarding p.15 lines 1-8; given the two-phase reasonableness review established by the Scoping Memo in this proceeding, does SDG&E have any modifications to this answer?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 1, 4 and 5. SDG&E further objects to this request on the grounds that it seeks discovery of information that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.

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**Request 4:**

Regarding p.21 lines 7-15, was the hazardous waste 90/10 cost sharing mechanism adopted after the costs were incurred or prior to the costs being incurred?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 3 and 5. SDG&E further objects to this request on the grounds that it seeks discovery of information that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.

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**Request 5:**

Regarding p.24 lines 3-5, has SDG&E ever sought or needed Commission approval for any insurance recoveries from its insurance providers?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 2, 3 and 5. SDG&E further objects to this request on the grounds that it seeks discovery of information , that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.



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**Request 6:**

Regarding p.7 line 7, what is the net dollar impact to shareholder earnings with the proposed 10% voluntary reduction to the WEMA costs?

**Objection:** SDG&E objects to this request on the grounds set forth in General Objection 5. SDG&E further objects to this request on the grounds that it seeks discovery of information that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.

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**Request 7:**

Regarding p.21 line 16 to p.22 line19, provide the dollar amounts, if any, of the miscellaneous revenue credits retained by shareholders for calendar years 2013, 2014, and 2015.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objection 5. SDG&E further objects to this request on the grounds that it seeks discovery of information that is outside of the scope of Phase 1 of this proceeding. See Scoping Memo at pp. 4, 5 and 9.