



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

January 9, 2017

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 19 – Wildfire Expense Memorandum Account

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 19 (ORA-SDG&E-A.15-09-010-19), dated December 22, 2016. SDG&E's response includes general objections and one narrative response.

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.

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-19, Q1
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E RESPONSE
DATE RECEIVED: December 22, 2016
DATE RESPONDED: January 9, 2017**

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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Request 1:

Is it SDG&E's understanding that General Order 95 (as discussed on page 14 of Mr. Weim's rebuttal testimony) prescribes a responsibility only on the last owner or operator to construct or erect facilities to maintain continuous/ongoing clearances? If not, please explain.

Response:

SDG&E believes General Order 95 prescribes a responsibility on the last owner or operator attaching to or constructing on a pole to ensure General Order 95 clearance violations are not created as a result of their work. In the case of the distribution span implicated in Guejito, Cox Communications was the last to install their lines in that span prior to the fire, and it was their responsibility to ensure General Order 95 clearances were met (ground clearance and 12kV to communication line). In the detailed overhead inspections that occurred after the Cox Communications lines were installed, clearances between the 12kV lines and the Cox Communications lines were one of the things SDG&E Line Checkers looked for.