



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

January 10, 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 17 – Wildfire Expense Memorandum Account**

Dear Mr. Stannik,

Attached please find SDG&E's response to ORA Data Request 17 (ORA-SDG&E-A.15-09-010-17), dated December 22, 2016. SDG&E's response includes general objections narrative responses and one attachment.

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-17, Q1-4  
SDG&E WEMA PROCEEDING - A.15-09-010  
SDG&E RESPONSE  
DATE RECEIVED: December 22, 2016  
DATE RESPONDED: January 10, 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.

**ORA DATA REQUEST**  
**ORA-SDG&E DR-17, Q1-4**  
**SDG&E WEMA PROCEEDING - A.15-09-010**  
**SDG&E RESPONSE**  
**DATE RECEIVED: December 22, 2016**  
**DATE RESPONDED: January 10, 2017**

**Request 1:**

Please provide all documents (in native format) generated or used by SDG&E in generating its rebuttal testimony.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 1, 2, 3, 5 and 7. Subject to the foregoing objections, SDG&E responds as follows.

**Response:**

It is unclear what documents ORA seeks in this request. If ORA seeks specific documents in native format, it should identify them, and SDG&E would then be willing to discuss providing them.

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**Request 2:**

Please provide a matrix or spreadsheet of who responded to each DR question sent by ORA in this proceeding. If SDG&E is proffering different witnesses than the individual(s) who answered a question, indicate as such in the matrix for each question where a different witness will be available.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 2 and 9. Subject to the foregoing objections, SDG&E responds as follows.

**Response:**

See document "Data Request Respondent and Witness Log\_Final" provided herewith.

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SDG&E RESPONSE  
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**Request 3:**

For each witness who provided testimony on behalf of SDG&E in this proceeding, please identify all persons who they consulted with in the preparation of such testimony.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 1, 5 and 9. Subject to the foregoing objections, SDG&E responds as follows. SDG&E further objects to this request to the extent it seeks discovery of Phase 2 information.

**Response:**

Mr. David Geier: Jonathan Woldemariam (SDG&E), Darren Weim

Mr. Ali Yari: Bill Cook (SDG&E), Bret Ball (SDG&E)

Mr. Darren Weim: Greg Walters, Willie Thomas (SDG&E), Bret Ball (SDG&E). Tara Heikens-Simmelink (SDG&E)

Mr. Greg Walters: Darren Weim

Mr. Don Akau: Chris Thompson (SDG&E), Diane Rodgers (SDG&E), Michael Daleo (SDG&E)

Mr. Steve Vanderburg: Brian D'Agostino (SDG&E), Mason Withers (SDG&E), Dr. Robert Fovell (SUNY Albany), Dr. Scott Capps (Atmospheric Data Solutions)

Dr. Jon Peterka: none.

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**Request 4:**

Regarding SDG&E's testimony in this proceeding, please identify all persons who were not consulted with in the preparation of such testimony, but who were identified in ORA's testimony.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 2, 3, 5 and 9.

<b>Data Request</b>	<b>Responder</b>	<b>Directed to/Testimony Referenced</b>
ORA 01, Request 1	Karen Sedgwick	N/A
ORA 01, Request 2	Karen Sedgwick	N/A
ORA 01, Request 3	Karen Sedgwick	N/A
ORA 02, Request 1	SDG&E Legal	N/A
ORA 02, Request 2	SDG&E Legal	N/A
ORA 02, Request 3	SDG&E Legal	Schavrien
ORA 02, Request 4	SDG&E Legal	N/A
ORA 02, Request 5	SDG&E Legal	N/A
ORA 02, Request 6	SDG&E Legal	N/A
ORA 03, Request 1	Steve Vanderburg, Randy Lyle	Dave Geier
ORA 03, Request 2	Steve Vanderburg	Dave Geier
ORA 03, Request 3	Don Akau	Don Akau
ORA 03, Request 4	Don Akau	Don Akau
ORA 03, Request 5	Don Akau	Don Akau
ORA 03, Request 6	Greg Walters	Greg Walters
ORA 03, Request 7	Darren Weim	Darren Weim
ORA 03, Request 8	Darren Weim	Darren Weim
ORA 03, Request 9	Darren Weim	Darren Weim
ORA 03, Request 10	Darren Weim	Darren Weim
ORA 04, Request 1	Objection, Phase 2	
ORA 04, Request 2	SDG&E Legal	Greg Walters/Darren Weim
ORA 04, Request 3	Don Akau	Don Akau
ORA 04, Request 4	Don Akau	Don Akau
ORA 04, Request 5	SDG&E Legal	Darren Weim
ORA 04, Request 6	Darren Weim	Darren Weim
ORA 04, Request 7	Greg Walters	Greg Walters
ORA 04, Request 8	Greg Walters	Greg Walters
ORA 04, Request 9	Don Akau	Don Akau



ORA 04, Request 10	Darren Weim, Karl Iliev	Darren Weim
ORA 04, Request 11	Darren Weim, Jose Lopez	Darren Weim
ORA 04, Request 12	SDG&E Legal	Don Akau
ORA 04, Request 13	Jon Peterka	Jon Peterka
ORA 04, Request 14	Jon Peterka	Jon Peterka
ORA 04, Request 15	SDG&E Legal	Darren Weim
ORA 04, Request 16	SDG&E Legal	Darren Weim
ORA 05, Request 1	Steve Vanderburg	Steve Vanderburg
ORA 05, Request 2	Danny Zaragoza	Ali Yari
ORA 05, Request 3	Steve Vanderburg	Steve Vanderburg
ORA 05, Request 4	Steve Vanderburg	Steve Vanderburg
ORA 05, Request 5	Steve Vanderburg	Steve Vanderburg
ORA 05, Request 6	Jon Peterka	Jon Peterka
ORA 05, Request 7	Steve Vanderburg	Steve Vanderburg
ORA 05, Request 8	Steve Vanderburg	Steve Vanderburg
ORA 05, Request 9	Joe Vaccaro	Dave Geier
ORA 05, Request 10	Randy Lyle	Steve Vanderburg
ORA 05, Request 11	Randy Lyle	Dave Geier
ORA 05, Request 12	Don Akau	Don Akau
ORA 05, Request 13	Don Akau	Don Akau
ORA 05, Request 14	SDG&E Legal	Ali Yari
ORA 05, Request 15	SDG&E Legal	Ali Yari
ORA 05, Request 16	SDG&E Legal	Don Aku
ORA 06, Request 1	Don Akau	Don Akau
ORA 06, Request 2	Steve Vanderburg	Jon Peterka
ORA 06, Request 3	Steve Vanderburg	Steve/Peterka
ORA 06, Request 4	Steve Vanderburg	Steve Vanderburg
ORA 06, Request 5	Steve	Steve/Peterka
ORA 06, Request 6	SDG&E Legal	N/A
ORA 06, Request 7	SDG&E Legal	N/A

ORA 06, Request 8	SDG&E Legal	Ali Yari/Dave Geier
ORA 06, Request 9	Hal Mortier	Ali Yari/Dave Geier
ORA 06, Request 10	SDG&E Legal	N/A
ORA 06, Request 11	SDG&E Legal	N/A
ORA 06, Request 12	SDG&E Legal	N/A
ORA 07, Request 1	Objection, Phase 2	N/A
ORA 07, Request 2	SDG&E Legal	N/A
ORA 07, Request 3	SDG&E Legal	N/A
ORA 07, Request 4	SDG&E Legal	Darren Weim
ORA 07, Request 5	Don Akau	Don Akau
ORA 07, Request 6	SDG&E Legal	Ali/Geier
ORA 08, Request 1	Don Akau	Don Akau
ORA 08, Request 2	Don Akau	Don Akau
ORA 08, Request 3	Don Akau	Don Akau
ORA 08, Request 4	Don Akau	Don Akau
ORA 08, Request 5	Darren/ Ron Rice/ Randy	Darren Weim
ORA 08, Request 6	Darren Weim	Darren Weim
ORA 09, Request 1	Ana Monroy (a. b.)/John Dollman (c)	Don Akau
ORA 09, Request 2	Don Akau	Don Akau
ORA 09, Request 3	Pete Girard	Don Akau
ORA 09, Request 4	Don Akau	Don Akau
ORA 09, Request 5	Don Akau	Don Akau
ORA 09, Request 6	Don Akau	Don Akau
ORA 09, Request 7	John Dollman	Don
ORA 10	Objection	N/A
ORA 11	Objection	N/A
ORA 12, Request 1	Darren Weim	Darren Weim
ORA 12, Request 2	Darren Weim	Darren Weim
ORA 12, Request 3	Darren Weim	Darren Weim

ORA 12, Request 4	SDG&E Legal	Darren/Geier
ORA 12, Request 5	SDG&E Legal	Darren /Geier
ORA 12, Request 6	SDG&E Legal	Ali Yari
ORA 12, Request 7	Darren Weim	Darren Weim
ORA 12, Request 8	Darren Weim	Darren Weim
ORA 12, Request 9	SDG&E Legal	Darren Weim
ORA 12, Request 10	SDG&E Legal	Darren Weim
ORA 12, Request 11	SDG&E Legal	Darren Weim
ORA 12, Request 12	Bill Cook	Darren Weim/Ali Yari
ORA 12, Request 13	Bill Cook	Darren Weim/Ali Yari
ORA 12, Request 14	Bill Cook	Darren Weim/Ali Yari
ORA 12, Request 15	Steve Vanderburg	Steve Vanderburg
ORA 13, Request 1	Darren Weim	Darren Weim
ORA 13, Request 2	Don Akau	Don Akau
ORA 13, Request 3	SDG&E Legal	N/A
ORA 14, Request 1	Don Akau	Don Akau
ORA 14, Request 2	Pete Girard	Don Akau
ORA 15, Request 1	SDG&E Legal	Ali Yari
ORA 15, Request 2	SDG&E Legal	Ali/Geier
ORA 15, Request 3	SDG&E Legal	Ali Yari
ORA 16, Request 1	Don Akau	Don Akau