



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

September 28, 2016

**Sent Via Electronic Mail**

A.15-09-010  
Wildfire Expense Memorandum Account

Mr. Don Kelly  
Utility Consumers' Action Network  
3405 Kenyon Street Suite 401  
San Diego, CA 92110

**Re: SDG&E Response to UCAN Data Request 03 - WEMA**

Dear Mr. Kelly:

Attached please find SDG&E's response to UCAN Data Request 3 (UCAN-SDG&E-A.15-09-010-3), dated September 14, 2016. SDG&E's response includes general objections and narrative responses.

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

**UCAN DATA REQUEST  
UCAN-SDG&E DR-03, Q1-2  
SDG&E WEMA PROCEEDING - A.15-09-010  
SDG&E RESPONSE  
DATE RECEIVED: September 14, 2016  
DATE RESPONDED: September 28, 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:**

Please provide the location (longitude and latitude coordinates) of the ignition points for the Witch, Rice and Guejito 2007 wildfires. Please name and provide the document or report that SDG&E is relying on for this information.

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 4 and 8. Subject to the foregoing objection, SDG&E responds as follows.

**Response:** This information can be obtained from the reports issued by the California Department of Forestry and Fire Protection (“Cal Fire”) into each of the three fires. These reports are publicly available at [http://calfire.ca.gov/fire\\_protection/fire\\_protection\\_firereports](http://calfire.ca.gov/fire_protection/fire_protection_firereports).

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**Request 2:**

Please provide the exact ignition times for the Witch, Rice and Guejito 2007 wildfires and provide the document or report that SDG&E is relying on for this information

**Objection:** SDG&E objects to this request on the grounds set forth in General Objections 4 and 8. Subject to the foregoing objection, SDG&E responds as follows.

**Response:** This information can be obtained from the reports issued by the California Department of Forestry and Fire Protection (“Cal Fire”) into each of the three fires. These reports are publicly available at [http://calfire.ca.gov/fire\\_protection/fire\\_protection\\_firereports](http://calfire.ca.gov/fire_protection/fire_protection_firereports).