



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

September 14, 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 Supplemental Response to ORA Data Request 13 – Wildfire Expense
Memorandum Account**

Dear Mr. Stannik,

Attached please find SDG&E's supplemental response to ORA Data Request 13 (ORA-SDG&E-A.15-09-010-13), dated August 24, 2016. Per the meet and confer held on September 13, 2016 between counsel for SDGE and ORA, SDG&E's supplemental response includes information within Request #1.

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-13, Q1-3
SDG&E WEMA PROCEEDING - A.15-09-010
SDG&E SUPPLEMENTAL RESPONSE
DATE RECEIVED: August 24, 2016
DATE RESPONDED: September 14, 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:

- a. At the time of the 2007 wildfires, what person(s) or department was/were responsible for scheduling the reinstallation of the facilities associated with the ignition of the Rice Fire after repair work was completed?
- b. When was the repair work that was completed on October 24, 2007 and October 31, 2007 on the facilities described in part (a) above scheduled?
- c. When was the re-energization (of the facilities described in part (a) above) scheduled?

Objection: SDG&E objects to this request on the grounds set forth in General Objection 5.

Response: Subject to and without waiving the objections set forth above, SDG&E provides this response following the September 13, 2016 meet and confer between counsel for SDG&E and ORA. The group responsible for repair and re-energization of the referenced facilities was Northeast Construction and Operations. While the scheduling of the work would have occurred between October 21, 2007 and the dates on which the repairs and re-energization were completed, SDG&E does not have any further information to provide.

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Request 2:

- a. Please provide the results (and any associated documents or workpapers) of the preinspection audit of the tree-trimming work that would have included tree FF1090 in October – November 2007.
- b. If not apparent in the documents provided in response to part (a) above, please provide the audit due date according to SDG&E’s vegetation management schedule, including the actual begin date of the audit and the actual end date of the audit.

Response:

- a. See attached “Auditor Summary Report and Certification of Audit Performed.pdf.” Also attached is a listing of the 471 record IDs for the VMA 379 audit work release (see attached “Audit Work Release Tree IDs (VMA 379)”. FF1090 (which is within VMA 379) is not included in this spreadsheet because it was not randomly selected for the audit.
- b. As stated within the Auditor Summary Report and Certificaiton of Audit Performed document, the audit start date was August 14, 2007, and the audit end date was August 22, 2007.

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Request 3:

Please provide the most recent version of TMC1320 (AKA: DOP3013, ESP109), or a confirmation of the most recent version number/date if these documents are already in ORA's possession. If TMC1320 has been superseded by another document or set of procedures, please provide:

- a. The date that TMC1320 was replaced by the new document/procedures;
- b. The most recent version of TMC1320 before it was superseded; and
- c. The name and most recent version of the replacing document.

Response:

The most recent version of TMC1320 is in ORA's possession. This document was included on the removable hard drive SDG&E produced in response to ORA-SDG&E DR-02 and within SDG&E's Second Supplemental Response to ORA-SDG&E DR-06. The effective date is 04/15/15 and the document number is TMC1320 (AKA: DOP3013, ESP109).