

**TURN DATA REQUEST  
TURN-SDG&E-DR-04  
OIL.12-10-013  
SDG&E RESPONSE  
DATE RECEIVED: APRIL 25, 2013  
DATE RESPONDED: MAY 3, 2013**

*The following questions relate to the Rebuttal Testimony of Andrew Scates served in I.12-10-013 on April 22, 2013.*

*Where reasonably practical, provide all requested workpapers in electronic Excel-compatible format with data and formulae intact and functioning.*

- (1) Provide workpapers, data and sources of data used to develop the estimated unit-specific Replacement Energy Costs shown in Table 1 on page 2 of Mr. Scates's Rebuttal Testimony.

**SDG&E Response 01:**

Please refer to the confidential documents provided in TURN DR-03 dated April 25, 2013 and provided to TURN in accordance with the signed NDA in I.12-10-013.

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(2) Provide workpapers, data and sources of data used to develop all estimated Replacement Energy costs shown in Table 2 on page 2 of Mr. Scates's Rebuttal Testimony.

**SDG&E Response 02:**

Please refer to the public documents provided in TURN DR-02 dated April 1, 2013. This is a public document and is posted to the SDG&E's website.

Q2(a)\_Category j\_CPM.xlsx

The confidential version of this document in response to this question is *attached and is provided to TURN in accordance with the signed NDA in I.12-10-013.*

**REMOVED DUE TO CONFIDENTIALITY**

In addition, please refer to the following *confidential documents provided in TURN DR-02 dated April 1, 2013 and provided to TURN in accordance with the signed NDA in I.12-10-013.* These documents are confidential in their entirety, and thus cannot be posted to the web site.

**REMOVED DUE TO CONFIDENTIALITY**

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- (3) Provide the following information regarding the letter regarding the Unit 3 outage that was “erroneously dated January 11, 2012, when in fact the notification was made on March 1, 2013” (1:17-10):
- a. Provide a copy of the letter and related information that led SDG&E to conclude that it was dated January 11, 2012.
  - b. Provide a copy of communications from SCE or others that led SDG&E to conclude that “the notification was made on March 1, 2013” instead.

**SDG&E Response 03:**

- a. See attached letter received from SCE regarding the Unit 3 outage schedule. Note that the cover letter is dated March 1, but the attachment with the actual outage schedule is dated January 11.

This letter is considered *confidential/privileged information pursuant to the Non-Disclosure Agreement between SDG&E and TURN.*

**REMOVED DUE TO CONFIDENTIALITY**

- b. See attached email exchanges between Ms. Wendy Keilani and Mr. Colin Cushnie of SCE. Upon request for clarification of the Unit 3 outage notifications, Mr. Cushnie provided a response with a tentative explanation for the misunderstanding of dates, followed up by another email that confirmed his earlier explanation, that the January 11 date was a footer that was inadvertently not updated when the March 1 5 Year Outage Letter was sent out.



Re SONGS 3  
Scheduled Outage tin



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