

ORA DATA REQUEST
ORA Data Request, ORA-SDGE- 001
A.17-12-013
(SDG&E 2018 Residential Rate Design Window)
Date Received: January 9, 2018
Date Submitted: January 22, 2018

SDG&E's General Objections

SDG&E objects to some of ORA's general discovery instructions, as follows (to the extent applicable, these same objections apply to all similar instructions contained in future ORA data requests):

1. Regarding the request to constantly update as new information becomes available, SDG&E objects to the extent it is overburdensome and vague as to what should be provided. As ORA knows, data may change over time. Accordingly, SDG&E relies on data reasonably available at the time the response is prepared. Subject to and without waiving this objection, if, in the future, ORA wishes to obtain any specific update, then they should make a separate request that will be considered at that time.
2. Regarding the request for sponsoring witness contact information, any contact with SDG&E witnesses for purposes of this proceeding should be made through the case manager and assigned attorney listed in the application.
3. Regarding the request for Word or other electronic versions of documents, SDG&E objects because the request is vague and standard production is in PDF format, which has the benefit of not being subject to alteration. Accordingly, data request responses will be produced in PDF format. Subject to and without waiving this objection, if the responses include attachments, typically Excel documents, they will be produced in their native format, where possible.
4. Regarding the request for Bates numbering, SDG&E will agree to use page numbers on data request responses.

Also, it should be noted that some of the data SDG&E is providing is considered CONFIDENTIAL, pursuant to the declarations provided with certain responses. Generally, each document uses yellow highlighting to indicate the confidential portions.

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Question 1:

Please provide the complete workpapers, in Excel-compatible spreadsheets or computer programs, with data and formulas intact and functioning, in support of this application.

SDG&E Response to Question 1:

SDG&E witnesses Jeffery J. Shaughnessy, Benjamin A. Montoya and William G. Saxe generated separate workpapers in support of their testimony (the other SDG&E witnesses did not generate separate workpapers in support of their testimony). These workpapers and the declarations supporting the confidentiality of certain information contained within the workpapers are being provided with the following file names:

Contains **Confidential** information, please contact Michelle Somerville (msomerville@semprautilities.com)

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Question 2:

Please provide, on an ongoing basis, copies in Microsoft Word of all data requests made by all other parties in this proceeding to SDG&E. Further, please also provide on an ongoing basis copies (either in Microsoft Word, Excel or in the same format as provided to the requesting party) all of SDG&E responses to all data requests in this proceeding.

SDG&E Response to Question 2:

SDG&E objects because the request is vague and standard production is in PDF format, which has the benefit of not being subject to alteration. Accordingly, data request responses will be produced in PDF format. Subject to and without waiving this objection, if the responses include attachments, typically Excel documents, they will be produced in their native format, where possible. Also, SDG&E will agree to post all its data request responses on a website, available to all the parties to the proceeding. To the extent the responses include confidential information, such information will not be posted, but can be separately requested on an as needed basis.