

UCAN DATA REQUEST – 01
UCAN Data Request in A.17-12-013
(Rate Design Window), Set 1
Date Received: January 4, 2018
Date Submitted: January 19, 2018

SDG&E’S GENERAL OBJECTIONS

SDG&E objects to some of UCAN’s general discovery instructions, as follows (to the extent applicable, these same objections apply to all similar instructions contained in future UCAN 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 UCAN 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, UCAN 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 standard production is in PDF format, which has the benefit of not being subject to alteration. Subject to and without waiving this objection, other electronic versions may be provided, if possible, upon specific request.

Question 1:

1. Please recalculate marginal customer costs included in this application for the calculation of eligible fixed costs (both NCO and Rental) reflecting the changes resulting from the “Tax Cuts and Jobs Act” of 2017, including changes to tax rates, interest deductions, and tax depreciation schedules for utilities, as applicable. Provide workpapers in executable Excel format supporting SDG&E’s calculations.

SDG&E Response to Question 1:

On December 22, 2017, the Tax Cuts and Jobs Act (the “Tax Act”) was enacted into law. The Tax Act represents the first major overhaul of the federal tax code in over 30 years. Given the significant complexity of the legislation, it will take time for SDG&E to perform a comprehensive review of the Tax Act and quantify its effects on various regulatory proceedings. SDG&E expects to complete its analysis of the Tax Act’s impact in March 2018 and, where applicable and necessary, will thereafter provide updated testimony and/or workpapers.