

EPUC DATA REQUEST
EPUC-SDG&E-DR-00
SDG&E 2020 COST OF CAPITAL
DATE RECEIVED: AUGUST 13, 2019
DATE RESPONDED: AUGUST 20, 2019

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, 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, or where the burden, expense, or intrusiveness of the request clearly outweighs the likelihood that the information sought will 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.
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

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documents that do not currently exist.

10. SDG&E objects to the production of information that has not been disclosed publicly and that contains highly market-sensitive confidential, proprietary, or trade secret information by reference to statutory protection, such that disclosure of, or reliance upon, this information would create a risk of competitive and financial harm to SDG&E, and where that information is not essential to the determination of this proceeding.

11. SDG&E objects to any request that states that it is ongoing or that requires subsequent, supplemental information.

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 and for no other purpose.

III. OBJECTIONS TO INSTRUCTIONS

1. SDG&E objects to Instruction D to the extent it purports to require the individual(s) responsible for providing the response and/or designate the proper witness to cross-examine concerning the response. The responses reflect SDG&E's response as a Company to the requests and not the work of any one individual.
2. SDG&E objects to Instructions G and J to the extent they purport to require SDG&E to go beyond what is required by the CPUC's Rules and Practice and Procedure. This instruction is unduly burdensome.
3. SDG&E objects to Instruction L to the extent it purports to require SDG&E to identify information or documents that are not in its possession, custody or control, or to ascertain whether documents have been destroyed in the past, which is unduly burdensome and may be impossible.

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4. SDG&E objects to Instruction M to the extent it purports to require SDG&E, with respect to privileged or confidential documents, to go beyond what is necessary to identify the document and its contents for purposes of determining whether a privilege exists.

IV. OBJECTIONS TO DEFINITIONS

1. SDG&E objects to the definition of “SDG&E” to the extent it purports to require SDG&E to produce documents in the possession, custody or control of “affiliates,” “parents,” “successors,” “predecessors,” or “assigns” or other entities not under the control of SDG&E. Notwithstanding this objection, SDG&E will produce any responsive, nonprivileged information that is in its possession, custody or control.

2. SDG&E objects to the definition of “Communication” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.

3. SDG&E objects to the definition of “Document” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.

4. SDG&E objects to the definition of “Identification” as overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, nonprivileged information that is in its possession, custody or control.

5. SDG&E objects to the definition of “Relate to” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.

6. SDG&E objects to the definition of “Study,” “studies,” “analyses,” and “reports,” because it is overbroad and unduly burdensome. Notwithstanding this objection, SDG&E will produce any responsive, non-privileged information that is in its possession, custody or control.

Subject to the foregoing general objections and express reservations, SDG&E responds as follows:

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V. RESPONSES

5-1. Please provide every instance where SDG&E changed the grid design and operation of its system because of either (1) a Direct Access (DA) program or (2) a Community Choice Aggregator (CCA).

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2 and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-1:

To date, SDG&E has not changed the grid design and/or operation of its electrical system because of a DA program or a CCA.

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5-2. Please specify every risk, uncertainty or impact, current or potential, to SDG&E's system or operations that are attributable to the PCIA program.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-2:

The Power Charge Indifference Adjustment (PCIA) is a mechanism used to calculate a charge paid by departing load customers for power procurement undertaken on their behalf prior to their departure from bundled service; it is intended to ensure compliance with the statutory cost indifference requirement set forth in California Public Utilities Code §365.2 . The PCIA is not a "program" administered by SDG&E and does not have a direct impact on SDG&E's electrical system or grid operations. The primary risk attributable to implementation of the PCIA is the potential for cost-shift to bundled service customers.

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5-3. Please provide all risk management techniques and strategies to mitigate risks of the PCIA program to SDG&E's system and operations.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3 and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-3:

Please see response to Question 5-2.

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5-4. Please identify every Commission order, decision or other directive identifying steps the Commission has taken to mitigate PCIA-related risks to SDG&E's system or operations.

a. Please identify and describe the decision, order or other directive and the risk(s) mitigated.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, 47 and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-4:

Please see response to Question 5-2; see also Commission Rulemaking 17-06-026.

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5-5. Please specify every risk, uncertainty or impact, current or potential, to SDG&E's system or operations that are attributable to CCAs.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3 and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-5:

CCA customers remain Transmission and Distribution customers of SDG&E. Thus, the formation of a CCA does not have an impact on SDG&E's electrical system or grid operations.

In addition, please see Prepared Direct Testimony of Don Widjaja (Exhibit SDG&E-03) at DW-22:3 – DW-23:5 and Prepared Rebuttal Testimony of Bruce A. Folkmann (Exhibit SDG&E-07) at BAF-12:7 – BAF-14:10.

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5-6. Please identify every instance where SDG&E was unable to recover costs, wholly or in part, from departing load customers in the past five years.

a. Please describe the events that took place and how they impacted SDG&E.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 3, 5 and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-6:

In D.18-10-019, the Commission adopted a revised PCIA methodology. Thus, the prior methodology and cost-shifts that may have occurred thereunder are not relevant to a future assessment of risk.

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5-7. Please estimate the total number of customers that opted out of a CCA and remained/returned to SDG&E utility service. Specifically, please provide the following:

- a. The number of customers that returned/remained with SDG&E broken down by month over the past five years.
- b. Quantify the amount of the departed load that remained/returned to the system. Concerning this response, please provide all responses on an electronic spreadsheet with all formulas and course data intact.

Objections: SDG&E objects to this request on the grounds set forth in General Objections Nos. 2, 5 and 9. Subject to the foregoing objection, SDG&E responds as follows.

SDG&E Response 5-7:

SDG&E currently has one operational CCA in its service territory, Solana Energy Alliance (SEA). SEA serves only the City of Solana Beach, which represents less than one percent of SDG&E’s load. SDG&E estimates the number of customers that opted out of a CCA and remained/returned to SDG&E is approximately 757 during the initial implementation (opted out within the first 60-day period-prior to 8/1/2018)

- a. As of June 1, 2018, SDG&E has a single CCA in our service territory. The number of customers that have returned/remained with SDG&E is approx. 19 per month.

Customers Opting Out	Opt Out Month	Opt Out Year
72	8	2018
54	9	2018
25	10	2018
19	11	2018
9	12	2018
10	1	2019
7	2	2019
7	3	2019
3	4	2019
4	5	2019
5	6	2019
9	7	2019
28	8	2019

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252	Total after 8/1/2018
19	Average Per Month

- b. SDG&E calculated the load from premises that either remained or returned to SDG&E from CCA implementation of June 1, 2018.

CCA Town	BILL_YR_MO	NET_KWH
CCA	201807	210,777
CCA	201808	386,102
CCA	201809	431,430
CCA	201810	349,594
CCA	201811	355,314
CCA	201812	371,487
CCA	201901	462,419
CCA	201902	386,376
CCA	201903	386,353
CCA	201904	309,641
CCA	201905	289,934
CCA	201906	307,564
CCA	201907	339,557

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5-8. Please identify any strategies or techniques engaged by SDG&E to entice CCA customers to return/remain with SDG&E utility services.

SDG&E Response 5-8:

SDG&E is prohibited from marketing against CCAs in both feasibility and operational phases, and has not employed any tactics to encourage customers to return or remain with SDG&E.

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5-9. Please provide every instance where a CCA failed to comply with its implementation plan within SDG&E service territory.

a. Please describe the events that took place and how they impacted SDG&E.

SDG&E Response 5-9:

Please see response to Question 5-7. SEA's compliance with its Implementation Plan is not measured or monitored by SDG&E.

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5-10. Please provide every instance where a CCA ceased providing service and returned customers to SDG&E without warning.

a. Please describe the events that took place and how they impacted SDG&E.

SDG&E Response 5-10:

Please see response to Question 5-7. SEA has not ceased providing service.