

**ENERGY PRODUCERS AND USERS COALITION (EPUC) AND INDICATED  
SHIPPERS (IS) DATA REQUEST  
EPUC/IS-DR-004  
SDG&E 2022 COST OF CAPITAL - A.21-08-014  
DATE RECEIVED: NOVEMBER 15, 2021  
DATE RESPONDED: NOVEMBER 30, 2021**

**INSTRUCTIONS**

The following general instructions apply to all data requests set forth herein.

A. Consider all the Definitions and General Instructions herein to be applicable to each item of discovery submitted by the above-referenced parties.

B. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information before or after the hearing. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.

C. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period.

D. For each separate discovery item, identify (see Definition No. G) the individual(s) responsible (whether primarily or indirectly) for providing the response. Further, please designate the proper witness, if any, to cross-examine at the hearing concerning the response. If witnesses have not yet been selected at the time a data response is provided, please supplement the response once witnesses have been selected to provide the requested information.

E. In producing documents and written responses pursuant to these discovery requests, designate and restate the request(s) and subpart(s) thereof in response to which each document or response is produced.

F. Where a document or narrative response is relevant to more than one request, a duplicate need not be provided. Where a discovery request can be answered in whole or in part by reference to a response to a preceding or subsequent discovery request (or subpart thereof), it is sufficient to indicate by specifying in the response, by number and date, which other discovery response answers it, and by specifying whether it is claimed that the response to the preceding or subsequent discovery request is a full or partial response to the current request being answered. If the latter, the response to the balance of the current discovery request shall be completed.

G. Whenever these discovery requests specifically request an answer, rather than the identification of documents, an answer is required and the production of documents in lieu thereof will not substitute for an answer.

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H. If information requested is not available in the exact form requested, provide such data or documents as are available and responsive to the particular discovery request.

I. As to any discovery request consisting of a number of separate subdivisions, or related parts or portions, a complete response is required to each part or portion with the same effect as if it were propounded as a separate discovery request.

J. Any objection to a discovery request should clearly indicate to which part or portion of the discovery request the objection is directed.

K. For each computer generated document identified (see Definition No. F) or produced in a response, state separately (a) what types of data files or tapes are included in the input and the source thereof; (b) the computer program; (c) a description of the recordation system employed (including program description, flow charts, etc.); and (d) the identification (see Definition No. G) of the person or persons, during the designated period, who were in charge of the collection of input materials, the processing of input materials, the data bases utilized, and/or the programming to obtain such output.

L. If any document described in any request for documents is no longer in your possession or control, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) has been otherwise disposed of.

M. If any document, in whole or in part, covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner: (a) a brief description of the document; (b) the date of the document; (c) the name of each author or preparer; (d) the name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis therefore (see Definition No. H).

N. If, in answering any of these discovery requests, there is deemed to be any ambiguity in interpreting either the discovery request or a definition or instruction applicable thereto, promptly call requester counsel to obtain a clarification.

O. Each document and individual response of more than one page shall be stapled or otherwise bound, and each page thereof consecutively numbered.

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**DEFINITIONS**

A. As used herein, the term “SDG&E” “Company,” or “Utility” means San Diego Gas & Electric Company and any and all of its respective present and former employees, agents, consultants, attorneys, officials, and any and all other persons acting on its behalf.

B. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.

C. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular whenever appropriate in order to bring within the scope of these discovery requests any information or documents which might otherwise be considered to be beyond their scope.

D. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, conferences, notes, correspondence, and all memoranda concerning the requested communications. Where communications are not in writing, provide copies of all memoranda and documents made relating to the requested communication and describe in full the substance of the communication to the extent that the substance is not reflected in the memoranda and documents provided.

E. The term “document” shall include, without limitation, all writings and records of every type in your possession, control, or custody, including but not limited to the following items, whether printed or reproduced by any process, including documents sent and received by electronic mail, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery; computer data files, information stored in electronic media, including on computer tapes, disks, or diskettes, tapes, inputs, outputs, and printouts; notes; letters; correspondence; communications; telegrams; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies) (see Definition No. I); comparisons; tabulations; budgets; workpapers; charts; plans; maps; drawings; engineering and other diagrams (including “one-line” diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; data compilations; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of meetings; transcripts; stenographic records; testimony and exhibits, including workpapers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of consultants; reports and summaries of negotiations; press releases; newspaper clippings; drafts and revisions of draft of documents; and any and all other records, written, electrical, mechanical, and otherwise. “Documents” shall also refer to copies of documents (even though the originals thereof are not in your possession, custody, or control), every copy of

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a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or appendices to any documents.

F. "Identification" of a document includes stating: (a) the identity of each person who wrote, dictated, or otherwise participated in its preparation, (b) the location of the document; and (c) the identity of each person having custody of or control over the document. "Identification" of a document includes identifying all documents known or believed to exist, whether or not in your custody or the custody of counsel or other representatives.

G. "Identification" of a person includes stating his or her full name, most recent known business address and telephone number, present position, and prior connection to or association with any party to this proceeding, including position at the time of connection to the information requested.

H. "Relate to," "concern," similar terms and phrases shall mean consist of, refer to, reflect, comprise, discuss, underlie, comment upon, form the basis for, analyze, or be connected with, in any way, the subject of these data requests.

I. "Study," "studies," "analyses" or "report(s)" denotes any document, as defined above, which reflects or was utilized in the collection, evaluation, analysis, summarization, or characterization of data in connection with these requests.

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**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 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 or non-disclosure agreement.

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 it purports 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 is 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.

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.

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**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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**Question 4-1:**

Referring to the SDG&E Compliance filing of November 8, 2021, the Company has provided a projected debt issuance for 2021 and 2022 on Appendix B. On an electronic spreadsheet with all formulas intact please provide the embedded debt cost calculation for 2021 in the same format as the embedded debt calculation for 2022. Clearly list all debt securities, their respective issuance and maturity date, cost of issuance, coupon rate, applicable discounts (premiums), etc. included in the calculation of the embedded cost of debt calculations shown on Appendix B of the Compliance filing

**SDG&E Response 4-1:**

Please refer to the separately attached spreadsheet "EPUC IS DR-04\_SDGE Embedded Cost of Debt (2021) - Supplemental Filing.xlsx," which provides the 2021 embedded cost of debt information.



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**Question 4-2:**

Referring to page 7 of the SDG&E Compliance filing of November 8, 2021, the Company estimated a revenue impact of reducing the Company's authorized ROE from 10.20% to 9.62% as triggered by the CCM of \$52.3 million for its electric operations and \$10.4 million for its gas operations. On an electronic spreadsheet with all formulas intact, please provide the calculations of this revenue impact.

**SDG&E Response 4-2:**

SDG&E objects to the characterization of what the CCM entails. Notwithstanding and without waiving this objection, please refer to the separately attached spreadsheet "EPUC-IS-DR-04\_Revenue Requirement.xlsx."

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**Question 4-3:**

Referring to the Direct Testimony of Ms. Mekiterian, the Company has provided an actual embedded debt cost for 2020 and projected debt cost for 2021 and 2022 in its Appendix A. On an electronic spreadsheet with all formulas intact please provide the embedded debt cost calculation for 2021 and 2022 in the same format as the embedded debt cost for 2020 and clearly list all debt securities, their respective issuance and maturity date, coupon rate, cost of issuance, applicable discounts (premiums), etc. included in the calculation of the embedded cost of debt as shown on Appendix A of her testimony.

**SDG&E Response 4-3:**

SDG&E's embedded debt cost calculation for 2022 was provided to EPUC/IS in Response 1-1 in the spreadsheet titled "EPUC\_IS-SDGE-DR-01-Embedded Cost of Debt.xlsx." Please refer to the separately attached spreadsheet "EPUC IS DR-04\_SDGE Embedded Cost of Debt (2020-2021).xlsx," which provides the 2020 and 2021 embedded cost of debt information.