

**EPUC DATA REQUEST
EPUC-SDG&E-DR-002
SDG&E 2020 COST OF CAPITAL
DATE RECEIVED: JULY 10, 2019
DATE RESPONDED: JULY 17, 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 documents that do not currently exist.

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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 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.

IV. OBJECTIONS TO DEFINITIONS

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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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- 2-1. Please provide the revenue requirement and tariff rate impact related to the proposed change in rate of return and return on equity in this proceeding. Specifically, please provide the following:
- a. Increase in revenue requirement collected from retail customers under Company proposed rate of return in base rates and all rider mechanisms that are impacted by a new rate of return.
 - b. Please estimate the spread of the base rate revenue increase, and rider mechanism revenue increase by tariff rate schedule – dollar and percentage increases.
 - c. Please provide a comparison of current revenue and revenue at proposed rate of return, by base rate, and rider mechanism, across all tariff rate schedules.

Concerning this response, please provide all responses on an electronic spreadsheet with all formulas and source data intact.

SDG&E Response 2-1:

- a. See separately attached file *EPUC-SDG&E-DR-Q2-1a_Rev Req.xlsx* (row 52).
- b. Regarding gas rate data, SDG&E believes this information is contained in the file accompanying EPUC-SDG&E-DR-01, Question 1-18, which was previously provided to the EPUC. SDG&E has modified the spreadsheet provided in EPUC-SDG&E-DR-01, Question 1-18, for purposes of responding to this question by shading the tariffs in grey. See separately attached file *EPUC-SDG&E-DR-Q2-1bc_Gas Rate Tables.xlsx*:
 - The increases to base rate revenue and rider mechanism revenue by tariff rate schedule (in dollars and percentages) are shown in columns K and M.
 - A comparison of current revenue is shown in column G. Revenue at SDG&E's proposed rate of return, by base rate and rider mechanism, across all tariff rate schedules are shown in column J.

For electric rate data, see separately attached file *EPUC-SDG&E-DR02_Q2-1b_Electric Rate Impact of Rev Change.xlsx*:

- The rate impact associated with revenue change by schedule is shown on tab Total Proposed Rate, column AU. The associated percentage change is shown in column AV.

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SDG&E Response 2-1:-Continued:

- c. For gas rates, please refer to the spreadsheet in subpart b above.

For electric rates, see separately attached file *EPUC-SDG&E-DR02 Q2-1c_Electric Revenues by Schedule.xlsx*:

- The revenue dollar changes by schedule is shown in column AO. The percentage change is shown in column AP.
- PCIA, and the revenues associated with DA exempt customers, are not calculated at the schedule level, rather at class level. Accordingly, the revenues and associated changes at the individual schedule level do not include these charges.