

ORA DATA REQUEST
ORA-SDGE-048-TCR
SDG&E 2019 GRC – A.17-10-007
SDG&E RESPONSE
DATE RECEIVED: DECEMBER 6, 2017
DATE RESPONDED: DECEMBER 20, 2017

Exhibit Reference: SDG&E-14

SDG&E Witness: Alan F. Colton

Subject: “Detailed Cost Estimates” referenced in SDG&E workpapers

Please provide the following:

1. SDG&E’s workpapers refer to “detailed cost estimates” as the basis for “zero-based” forecasts. For example, see Ex. SDG&E-14 workpapers, p. 31. Were the “detailed cost estimates” referenced in SDG&E workpapers completed and existing as of the application date of October 6, 2017?

SDG&E Response 1:

Yes, the detailed cost estimates referenced in SDG&E workpapers were completed and existing as of the application date of October 6, 2017.

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2. ORA data request ORA-SDGE-016-TCR issued November 7, 2016, requested copies of the “detailed cost estimates” referred to in Question 1. As of December 6, 2017, no “detailed cost estimates” have been provided to ORA.
 - a. Please explain why SDG&E required, and continues to require, additional time to provide these “detailed cost estimates.” Include in this explanation the steps SDG&E undertook/will undertake to generate/compile and transmit the subject “detailed cost estimates.”
 - b. Please state when this information will be provided to ORA.

SDG&E Response 2:

- a. SDG&E considers the original workpapers and supplemental workpapers provided with the application to be sufficient representation of the detail information necessary to support its request, and are similar in nature to workpapers provided for these type of requests in previous rate cases. SDG&E endeavors to prepare its General Rate Case presentation so that all or most of the testimony chapters and workpapers can be submitted publicly, at a level of detail that does not burden the record with unduly voluminous information, or information that must be protected from public disclosure. ORA has requested specific additional detail in its data requests.

Within the workpapers of SDG&E-14-CWP are contained 116 budgets, or workpaper sets. Of these, 49 are ‘zero-based’ budgets for which ORA seeks additional detail that fall into the categories requested. Much of the additional underlying information that led to the production of these forecasts and workpapers is embedded within various data applications housed in various SDG&E organizations, and is time-consuming to identify, locate and retrieve in a format available for production to an outside entity. Further, any information being produced to an outside entity must be reviewed to identify information that would be potentially harmful, if publicly disclosed. Under the Commission’s new confidentiality procedures, SDG&E must follow specific guidelines for identifying, marking and verifying information that needs to be protected, on a case-by-case basis, including obtaining a case by case confidentiality declaration that specifically identifies the protected information and provides a legal justification for protecting the information. The declaration must then be signed by an officer, which can also be time consuming. The identification, extraction, verification and review of any confidential information, particularly under the Commission’s new procedural requirements, is time consuming and requires many resources, often involving several departments, and is logistically difficult to produce in the short data-response turnaround time. The principal cause of the extended duration to provide the requested “detailed cost estimates” pertains to the information being maintained in various department locations and the time required to pull the large amount of information together for a complete response. In addition, the steps required to compile the cost estimates entail verification with the initial budget ‘owners’ who provided the information to ensure the proper presentation of estimates so the submittal of the “detailed cost estimates” is of similar format.

SDG&E has provided a response of an example of a representative forecast estimate.

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SDG&E Response 2 Continued:

- b. SDG&E is working to complete the compilation of additional detail for each of the remaining relevant budgets and proposes to provide those in batches as they can be produced through Dec. 22.