

**ORA DATA REQUEST**  
**ORA-SDGE-067-MRK SUPPLEMENTAL**  
**SDG&E 2019 GRC – A.17-10-007**  
**SDG&E RESPONSE**  
**DATE RECEIVED: JANUARY 31, 2017**  
**DATE RESPONDED: MARCH 8, 2017**

**Exhibit Reference:** SDG&E-40  
**SDG&E Witness:** Eric Dalton  
**Subject:** Miscellaneous Revenues

**Please provide the following:**

During a January 31st telephone conversation between Truman Burns, Office of Ratepayer Advocates (ORA) and Kelly Hart, San Diego Gas and Electric (SDG&E) and as memorialized via emails between ORA and SDG&E on that same day, the two parties agreed that SDG&E would provide 2016 recorded costs for CIAC construction costs, broken out by labor, non-labor, and budget code as originally requested in Question 2 of ORA-SDGE-067-MRK.

This request was further revised during a telephone conversation between Clayton Tang and Truman Burns of ORA, on the one hand, and Chuck Manzuk, and Kelly Hart of SDG&E, on the other hand, on March 2, 2018, where the parties agreed that to satisfy ORA's request, (i) SDG&E does not need to provide a perfect reconciliation to the numbers originally provided in response to Question 1 of ORA-SDGE-019-MRK; and (ii) that as a proxy, SDG&E can instead provide an analysis of a sample of the CIAC data and that this sample would be representative of the splits between labor, non-labor, and other CIAC construction costs.

**SDG&E Response:**

SDG&E objects to this request pursuant to Rule 10.1 of the Commission's Rules of Practice and Procedure on the grounds that it seeks the production of information that is neither relevant to the subject matter involved in the pending proceeding nor is reasonably calculated to lead to the discovery of admissible evidence, and further on the ground that the burden and intrusiveness of this request outweigh the likelihood that the information sought will lead to the discovery of admissible evidence. SDG&E has not requested a revenue requirement for CIAC construction costs. SDG&E is not required to create new data or present existing data in a different form beyond that which might be readily available. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Based on the agreement with ORA on March 2, 2018, please see the attached Excel file: ORA-SDGE-067-MRK Supplemental Attachment.