

**ORA DATA REQUEST**  
**ORA-SDGE-078-TCR**  
**SDG&E 2019 GRC – A.17-10-007**  
**SDG&E RESPONSE**  
**DATE RECEIVED: JANUARY 5, 2018**  
**DATE RESPONDED: JANUARY 30, 2018**

**Exhibit Reference:** Multiple  
**SDG&E Witness:** Multiple  
**Subject:** Disclosure of Sensitive data

**Please provide the following:**

1. In response to data requests issued to date, SDG&E has in some cases not provided requested information based on SDG&E assertions of confidentiality or sensitive data. For example, SDG&E's response to data request ORA-SDGE-056-TCR, Q.9 (attached) stated that ORA's question "seeks restricted confidential information requiring maximum control, the release of which could cause an impairment of business activities, significant economic damage and/or the health and well-being of individuals, and may also cause a violation of law."
  - a. Would SDG&E's responses, and decision not to provide requested information in some cases, differ if the data request originated from the CPUC's SED or Energy Division, as opposed to originating from ORA?

**SDG&E Response 01:**

SDG&E objects to this request under 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 likely reasonably calculated to lead to the discovery of admissible evidence, and on grounds that the request is burdensome. Subject to and without waiving the foregoing objection, SDG&E responds as follows:

Certain information at SDG&E is restricted on a "business need" or "need-to-know" basis, even amongst employees. Information may be limited to the fewest number of individuals to reduce the risk of compromise or misuse. This is one reason why SDG&E may not be able to provide ORA with certain sensitive information through the normal discovery process of the GRC. Alternatively, SDG&E can accommodate ORA requests to review sensitive information in an on-site visit. This "reading room" approach is consistent with the manner in which SDG&E has shared sensitive information with ORA and other Commission staff within the context of other proceedings. (See, e.g., the July 28, 2017 joint comments of SDG&E, Pacific Gas and Electric Company and Southern California Edison Company in the Commission's rulemaking on electric physical security, R.15-06-009).